

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

NORTHERN RECEIVED

JEFFERY JAMES JACKSON

2006 JAN -4 A 9 09

PETITIONER

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

V.

CIVIL ACTION NO. 2:05-CV-

D. T. MARSHALL, et al.,

1164-F

RESPONDENTS.

MOTION TO AMEND PETITION

COMES NOW, THE PETITIONER JEFFERY J. JACKSON PRO SE AND MOVES THIS HONORABLE COURT IN THE ABOVE STYLE CAUSE. IN SUPPORT OF THIS MOTION THE PETITIONER STATES THE FOLLOWING:

- (1.) THE PETITIONER SEEKS AN ORDER FROM THIS HONORABLE COURT TO DIRECT THE RESPONDENTS TO FILE AN ANSWER ADDRESSING THE CLAIMS PRESENTED IN THE PETITION, AS AMENDED
- (2.) THE ARRESTING OFFICER, CPL. GUY NAQUIN, #115 FILED A COMPLAINT ALLEGING THAT THE PETITIONER RESISTED ARREST AND WAS ARMED WITH A HAND-GUN. THIS INFORMATION IS PURSUANT TO ALABAMA UNIFORM ARREST REPORT. THE PETITIONER CONTENDS THAT OFFICER NAQUIN FILED A FABRICATED COMPLAINT.
- (3.) PURSUANT TO THE MONTGOMERY ADVERTISER, THE

POLICE DEPARTMENT SPOKESMAN, LT. HUEY THORNTON STATED THAT THE PETITIONER WAS STILL AT THE SCENE OF AN APPARENT ACCIDENT WHEN POLICE AND PARAMEDICS ARRIVED. THE PETITIONER CONTENDS THAT LT. HUEY THORNTON, THE MONTG. POLICE OR PARAMEDICS DID'NT TESTIFIED AT THE PETITIONER PRELIMINARY HEARING. DETECTIVE GUY NAQUIN IS THE ONLY STATE WITNESS WHO TESTIFY FALSELY COMMITTING PERJURY.

(4) MARCH 26, 2004, THE PETITIONER RECIEVED A PRELIMINARY HEARING. DETECTIVE GUY NAQUIN TESTIFIED UNDER OATH FALSELY, MALICIOUSLY AND DELIBERATELY TO MISLEAD THE COURT WITH THE INTENTION TO CAUSE HARM TO THE PETITIONER.

IN LIGHT OF THE FOREGOING, THE PETITIONER CONTENDS THAT HE IS HELD IN VIOLATION OF THE FEDERAL CONSTITUTION AND THE STATE COURT FAILED TO PROPERLY ADDRESS HIS CLAIMS.

RESPECTFULLY SUBMITTED THE 2ND DAY OF JANUARY 2006.

Jeffery J. Jackson
PETITIONER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THIS MOTION HAS BEEN PLACED IN THE UNITED STATES MAIL BOX, LOCATED AT THE MONTGOMERY JO. DETENTION FACILITY POSTAGE PRE-PAID AND ADDRESSED PROPERLY TO THE ATTORNEY GENERAL OF THE STATE OF ALABAMA, TROY KING.

TROY KING - ATTORNEY GENERAL
11 SOUTH UNION STREET
MONTGOMERY, ALABAMA 36130-0152

DONE THIS THE 2ND DAY OF JANUARY 2006.

Sincerely
Jeffery J. Jackson
PETITIONER - PRO SE

I DECLARE UNDER PENALTY OF PERJURY THAT THE
FOREGOING IS TRUE AND CORRECT.

EXECUTED ON JANUARY 2ND 2006.

Jeffery J. Jackson
PETITIONER - PRO SE